

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

ADWOWA JACOBS)	
)	
Plaintiff,)	
)	
vs.)	CASE NO. 2:05 CV 925-T
)	
ELECTRONIC DATA SYSTEMS)	
CORPORATION and JEFF WILLIAMS,)	
)	
Defendants.)	

MOTION TO EXTEND DISCOVERY DEADLINE

COMES NOW Defendant **Jeff Williams** and moves the Court to extend the time for completing discovery in the above-styled cause from its current setting of November 28, 2006, to and including December 6, 2006, for the limited purpose of taking a deposition, and in support states as follows:

1. Pursuant to the Court's Order dated March 7, 2006, the trial of the above case is scheduled on January 29, 2007, and the deadline for completing discovery is November 28, 2006.
2. Counsel for Defendant recently received responses to Rule 45 Subpoenas and there is a need for the deposition of one of Plaintiff's treating physicians. The first available date for Vonceil Smith, Ph.D., to participate in a deposition is December 6, 2006. A copy of the Notice of Deposition is attached hereto.
3. Counsel for Defendant is only requesting this extension for the limited purpose of taking the referenced deposition.
4. Plaintiff will not be prejudiced by such request.

WHEREFORE, PREMISES CONSIDERED, Defendant **Jeff Williams** respectfully requests that this Honorable Court extend the deadline for discovery from November 28, 2006, to and including December 6, 2006, for the limited purpose of taking the referenced deposition.

Respectfully submitted this 16th day of November, 2006.

s/ James E. Williams

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have electronically sent a copy of the foregoing Motion to Extend Discovery Deadline to the following on this the 16th day of November, 2006, to the following:

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